

### III. REMARKS

Claims 1-14 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 2, 7, 8, 13 and 14 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Ichnowski (U.S. Patent No. 5,608,783), hereafter "Ichnowski." Claims 3-5 and 9-11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ichnowski in view of Shear (U.S. Patent No. 5,627,972), hereafter "Shear." Applicants respectfully traverse the rejections for the following reasons.

Initially, Applicants state that it is with great difficulty that Applicants attempt to interpret the Office's arguments. For example, with regard to the Office's arguments about the Ichnowski references, the Office cites a four paragraph section of Ichnowski against claims 1, 2, 7, 8, 13 and 14 of the claimed invention without specifying the portions of the passage that the Office believes anticipate specific features of the claimed invention. As such, Applicants will attempt to discern these specifics from the text of Ichnowski and respond accordingly.

**A. REJECTION OF CLAIMS 1, 2, 7, 8, 13 and 14 UNDER 35 U.S.C. §102(b)**

With regard to the 35 U.S.C. §102(b) rejection over Ichnowski, Applicants submit that Ichnowski does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 7, 13 and 14, Applicants submit that Ichnowski fails to teach, *inter alia*, transforming an input message in any of a plurality of formats. Instead, the passage of Ichnowski cited by the Office teaches, "...a set of predefined status signals may be associated with (and ultimately be translated into), a set of process control signals." Col. 15, lines 52-54. To this extent, the status signals of Ichnowski are not in any of a plurality of formats but are instead predefined. Nowhere in the passage cited by the Office or elsewhere does Ichnowski teach messages that are in a plurality of formats. In contrast, the claimed invention includes "...transforming an input message in any of a plurality of formats." Claim 1. As such, the input message of the claimed invention is not simply a predefined status signal as in Ichnowski, but rather may be in any of a plurality of formats. Thus, the predefined status signals of Ichnowski do not teach the input messages of the claimed invention. Accordingly, Applicants request that the Office's rejection be withdrawn.

With further respect to independent claims 1, 7, 13 and 14, Applicants respectfully submit that Ichnowski also fails to teach, *inter alia*, responsive to said compatibility determination and said statistical analysis to select the best fit output message field into which to transform a given input message field. As stated above, Ichnowski teaches that "...a set of predefined status signals may be associated with (and ultimately be translated into), a set of process control signals." Col. 15, lines 52-54. However, the process control signals of Ichnowski, rather than having output message fields formed from transformed input message fields, are completely

different from the predefined status signals. For example, examples of status signals of Ichnowski include "destination busy", "successful message delivery", and "originating system has hung up". Col. 1, lines 33-45. As such, the Ichnowski status signals indicate a status of the system. In contrast, examples of the process control signals of Ichnowski include "retrying message delivery" and "returning the message", and, as such are directions to the system. Col. 14, lines 4-7. To this extent, process control signals are completely different from status signals and are not a transformation of status signals having the output fields formed from transformed input fields from the status signals.

Furthermore, the process control signals of Ichnowski are not formed using statistical analysis as in the claimed invention. Instead, Ichnowski teaches "...a set of process control signals which: ... (c) enable a range of meaningful statistics to be accumulated." Col. 15, lines 52-59. To this extent, the statistics of Ichnowski are enabled by the process control signals and not used to transform the status signals into process control signals. The claimed invention, in contrast, includes "...responsive to said compatibility determination and said statistical analysis to select the best fit output message field into which to transform a given input message field."

Claim 1. As such, the statistical analysis of the claimed invention is not enabled by a set of process control signals formed by translating a set of predefined status signals as are the statistics in Ichnowski, but rather are used to select the best fit output message field into which to transform a given input message field. Furthermore, unlike in Ichnowski in which the status signals and process control signals are completely different, the output message field of the claimed invention is a transformed version of a given input message field. For the above reasons, the features of Ichnowski cited by the Office do not teach the transformation using

statistical analysis as included in the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the dependent claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**B. REJECTION OF CLAIMS 3-5 and 9-11 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over Ichnowski in view of Shear, Applicants respectfully submit that there is no motivation to modify Ichnowski with Shear. For example, Ichnowski does not teach that any of its messages have a higher priority than any other message. As such, there is no motivation in Ichnowski to incorporate the source object levels of Ichnowski. In addition, the combined features of the cited references fail to teach or suggest each and every feature of the claimed invention. Applicants herein incorporate the arguments presented above with respect to the independent claims from which the dependent claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

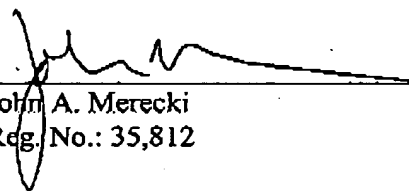
#### IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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